

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Elizabeth KM Carrier

GENERAL INFORMATION:

Name:	Cooper Standard Automotive
Address:	250 Oak Grove Drive Mt. Sterling, KY 40353
Date application received:	6/11/2008
SIC Code/SIC description:	3052, Rubber and Plastics Hose and Belting
Source ID:	21-173-00030
Agency Interest:	39374
Activity:	APE20080002
Permit:	V-08-040

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual ¹ (tpy)	Potential (tpy)
PM/PM ₁₀	0.37	1.23
SO ₂	0.029	0.10
NO _x	4.82	16.23
CO	4.11	13.63
VOC	125.789	107.85
Carbon Disulfide	29.819	7.229
Source wide HAPs	51.189	14.59

1. Based on 2007 KY EIS

SOURCE DESCRIPTION:

On June 10, 2008 Cooper Standard Automotive Mt Sterling Plant (CSA) submitted an application for the renewal of their Title V/Synthetic Minor permit, V-03-041 R4. Supplemental information was received on August 5th, September 4th and October 22nd, 2008 and the application was considered complete on November 17, 2008. CSA currently operates two (2) boilers with a total heat input capacity of 25.2 MMBtu/hr at their facility in Mt Sterling, Kentucky. The plant produces automotive reinforced rubber hose in various diameters, lengths, and shapes. The main raw materials involved in hose production are rubber and reinforcing yarn. Secondary raw materials include adhesive and lubricant. The processes involved in reinforced rubber hose production include the extrusion of rubber on the Knit/Spiral Hose Lines #1, #2, and #3, printer stations for the customer, adhesive application operations, rubber curing in the Autoclaves, and the hose finishing operations.

CSA has applied for the addition of a third natural gas boiler with heat input capacity of 12.6 MMBtu/hr. CSA will no longer be using the #2 fuel oil as a secondary fuel in any of the boilers. In the renewal application, CSA has updated the potential carbon disulfide (CS₂) emission calculation from the autoclaves based on stack test emissions from their Cooper Standard Automotive Bowling Green plant. Additionally in this process, the rubber extrusion operation precedes the autoclaves and the autoclaves can process no more than the rubber extruders produce. Potential carbon disulfide emission values were calculated using the maximum production rate from the rubber extruder.

Included in the renewal application, CSA has removed the trimethylbenzene and isophorone emissions from potentials because the EPA has deleted those factors from the submitted, industry-provided information prior to issuing AP-42 factors. CSA is a major source for Volatile Organic Compounds (VOCs). A majority of their VOCs come from the emission of carbon disulfide. CSA has also requested to change their permit from a Title V/Synthetic Minor to a Title V, based on the new emission calculations

CSA requests removal of the following items from their list of insignificant activities:

SN-18 and 19 Two cold cleaning degreasers (parts washers)
Multi-Layer Plastic Tubing Line 1
Multi-Layer Plastic Tubing Line 2
Hot air blower #1.
Conveyor.
Rubber Mill

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

State-only requirement: in accordance with 401 KAR 63:021, existing sources emitting toxic air pollutants, the source wide emissions of carbon disulfide shall not exceed 48.6 pounds per hour. The permittee shall maintain records of materials containing CS₂ and hours of operation on a monthly basis.